

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

KALDOON HADDAD,)	
)	
PLAINTIFF,)	
)	Case No. 16-cv-03935
v.)	
)	Hon. John J. Tharp, Jr.
AMERICAN CORADIUS)	
INTERNATIONAL, INC.,)	Magistrate Judge Sheila M. Finnegan
)	
DEFENDANT.)	

PLAINTIFF'S NOTICE OF SUPPLEMENTAL AUTHORITY

On August 31, 2016, the United States District Court for the Eastern District of New York decided in *Bautz v. ARS National Services, Inc.*, denying a Rule 12(b)(6) motion to dismiss on identical language to that at issue in the instant matter, concluding that:

...the combination of the term "will report", as well as the term "as required" reasonably communicates to the least sophisticated consumer that any forgiveness of debt without any qualifications or conditions will be reported to the IRS because it is required by the IRS regulations.

Bautz v. ARS National Services, Inc., No. 16-cv-00768-JFB-SIL (E.D.N.Y. August 31, 2016) (oral ruling) (Exhibit A, Transcript for Civil Cause).

Respectfully submitted,

By: s/Celetha Chatman
One of Plaintiff's Attorneys

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CERTIFICATE OF SERVICE

I, Celetha C. Chatman, an attorney, hereby certify that on August 9, 2016, I electronically filed the foregoing Notice of Motion using the CM/ECF system, which will send notification of such filing to all registered participants on the system.

Respectfully submitted,

By: s/Celetha Chatman
One of Plaintiff's Attorneys

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